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***Attorneys for Defendant
NETFLIX, INC.***

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**UNOPPOSED MOTION BY PLAINTIFF'S
FORMER ATTORNEY, WILLIAM
RAMEY AND RAMEY LLP, FOR
EXTENSION TO RESPOND TO MOTION
FOR AN ORDER TO SHOW CAUSE AND
SANCTIONS**

Hearing date: May 8, 2025

Time: 2:00 p.m.

Judge: Hon. Jon S. Tigar

Courtroom 6 – 2nd Floor

Pursuant to 6-1(b) of the Civil Local Rules of the United States District Court, Northern
District of California. Plaintiff's Former Attorney, William Ramey and Ramey LLP (collectively

1 “Ramey”) files this Motion for Extension to file a Response to Defendant Netflix, Inc.’s (“Netflix”)
2 Motion for an Order to Show Cause and Sanctions by three weeks to March 25, 2025. Netflix’s
3 deadline to file a Reply in Support of its Motion for an Order to Show Cause and Sanctions would
4 be extended commensurately to April 22, 2024 (i.e., sixteen days before the noticed hearing date).
5 Neither the hearing date nor any other deadline will be impacted by the requested extensions.

6 Netflix filed its Motion on February 18, 2025, (Doc. No. 302) and the response is currently
7 due on March 4, 2025. Good case exists as Ramey seeks the extension to obtain counsel in this
8 matter.
9

10 Ramey and counsel for Netflix have met and conferred by email on February 24, 2025
11 regarding the matters stated above. Netflix has indicated that it is unopposed.
12

13 Respectfully submitted,
14

15 **Ramey LLP**

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